UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

In re:

The Financial Oversight and Management Board for Puerto Rico.

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

PROMESA Title III

No. 17 BK 3283-LTS

PROMESA Title III

No. 17 BK 04780-LTS

Court Filing Relates Only to PREPA and Shall only be Filed in Case No. 17-BK-4780-LTS and Main Case 17-BK-3283-LTS

JOINDER OF THE AD HOC GROUP OF PREPA BONDHOLDERS TO THE URGENT MOTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ORDER, UNDER 11 U.S.C. § 1103 AND BANKRUPTCY RULE 2004, AUTHORIZING DISCOVERY WITH RESPECT TO PREPA ENGAGEMENT OF WHITEFISH ENERGY HOLDINGS, LLC AND URGENT REQUEST FOR HEARING

The Ad Hoc Group of PREPA Bondholders (the "Ad Hoc Group") respectfully submits this joinder (the "Joinder") to the *Urgent Motion of Official Committee of Unsecured Creditors* for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery With Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Hearing [Dkt. No. 364] (the "Motion") dated October 30, 2017. Through this Joinder, the Ad Hoc Group seeks to join in the relief requested through the Motion, solely for the purposes of receiving any documents obtained by, and participating in any depositions taken by, the Official Committee of Unsecured Creditors, whether against PREPA or a third party.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, today November 6, 2017.

TORO, COLÓN, MULLET, RIVERA & SIFRE, P.S.C.

s/ Manuel Fernández-Bared

MANUEL FERNÁNDEZ-BARED USDC-PR No. 204,204

E-mail: mfb@tcmrslaw.com

s/Linette Figueroa-Torres

LINETTE FIGUEROA-TORRES

USDC-PR No. 227,104 E-mail: <u>lft@tcmrslaw.com</u>

s/Nayda Pérez-Román

NAYDA PEREZ-ROMAN USDC-PR No. 300,208

E-mail: nperez@tcmrslaw.com

P.O. Box 195383

San Juan, PR 00919-5383

Tel.: (787) 751-8999

Fax: (787) 763-7760

Counsel to the Ad Hoc Group of PREPA

Bondholders

KRAMER LEVIN NAFTALIS & FRANKEL LLP

s/Amy Caton

AMY CATON*

GREGORY A. HOROWITZ*

THOMAS MOERS MAYER*

ALICE J. BYOWITZ*

DOUGLAS BUCKLEY**

1177 Avenue of the Americas

New York, New York 10036

Tel.: (212) 715-9100

Fax: (212) 715-8000

Email: tmayer@kramerlevin.com

acaton@kramerlevin.com

ghorowitz@kramerlevin.com

abyowitz@kramerlevin.com

dbuckley@kramerlevin.com

*admitted pro hac vice

**admitted *pro hac vice* in Case No. 17-BK-

3283-LTS

Counsel to the Ad Hoc Group of PREPA

Bondholders